

# Exhibit S

**Re: Garcia v. City of LA--failure to provide adequate notice of comprehensive cleanups, request to meet and confer**

Shayla R. Myers &lt;SMyers@lafla.org&gt;

Thu 8/13/2020 11:21 AM

To: Gabriel Dermer &lt;gabriel.dermer@lacity.org&gt;

Cc: Felix Lebron &lt;felix.lebron@lacity.org&gt;; Patricia Ursea &lt;patricia.ursea@lacity.org&gt;; Scott Marcus &lt;Scott.Marcus@lacity.org&gt;; Herbert, Benjamin Allen &lt;benjamin.herbert@kirkland.com&gt;; Catherine Sweetser &lt;catherine.sdshhh@gmail.com&gt;; Onufer, Michael &lt;michael.onufer@kirkland.com&gt;

Counsel,

Please be advised that, despite the City's representation on Monday that the City had updated the permanent postings around the City to remove references to the enjoined Bulky Item Provision, we confirmed that the City has not actually updated the vast majority of the signs in at least one of the City's SECZs. There are over 100 signs around the Raymer shelter that have not been updated. The City's misrepresentation about this, even while defending itself against a motion for contempt, further illustrates why court intervention is necessary, and why we are seeking sanctions against the City.

We intend to bring this to the attention of the Court and will provide documentary evidence at that time, but we are letting you know now to ensure the notices are updated in advance of any cleanups the City may conduct.

Thanks,

Shayla

**Shayla Myers** | Senior Attorney  
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**From:** Gabriel Dermer <gabriel.dermer@lacity.org>**Sent:** Wednesday, August 12, 2020 6:51 PM**To:** Shayla R. Myers <SMyers@lafla.org>**Cc:** Felix Lebron <felix.lebron@lacity.org>; Patricia Ursea <patricia.ursea@lacity.org>; Scott Marcus <Scott.Marcus@lacity.org>; Herbert, Benjamin Allen <benjamin.herbert@kirkland.com>; Catherine Sweetser <catherine.sdshhh@gmail.com>; Onufer, Michael <michael.onufer@kirkland.com>**Subject:** Re: Garcia v. City of LA--failure to provide adequate notice of comprehensive cleanups, request to meet and confer

Hi Shayla,

We are investigating this and will get back to you as soon as we have some information. Thanks.

On Wed, Aug 12, 2020 at 11:22 AM Shayla R. Myers <[SMyers@lafla.org](mailto:SMyers@lafla.org)> wrote:

Counsel,

After not conducting comprehensive cleanups for almost five months and then posting notices that violated the Court's preliminary injunction, we have learned that the City has now chosen to resume comprehensive cleanups in special enforcement zones without posting any kind of notice to residents that the cleanups would resume this week. It is our understanding that this occurred at El Puente yesterday, and is currently happening at Schrader. We also understand that there are no notices posted in Venice for what we assume may be a cleanup tomorrow.

This is contrary to the City's actions last week at Beacon, when Mr. Lebron made clear that the City posted the paper notices of major cleanings in advance of the cleaning to provide "additional notice to unhoused residents in the area because cleanup operations had been suspended." We actually disagree with the City's factual representations on this point, but based on this representation, we expected that the City would continue to provide notice before resuming cleanups in the other SECZs around the City, for the reasons stated by Mr. Lebron and also because the City represented in that email that the City intended to use the new CARE+ notices for future CARE+ comprehensive cleanups.

As a result of the City's decision to conduct these cleanups with little or no notice to residents, a number of individuals were unaware that the cleanups were happening, and residents have lost significant belongings. There is no justification for the City's failure to provide notice to residents that the cleanups were resuming.

We request you take all necessary steps to stop conducting the comprehensive cleanup immediately, and not commence other cleanups until the parties can discuss this.

Sincerely,

**Shayla Myers** | Senior Attorney  
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